

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

DOUGLAS JOHNSON  
Plaintiff,

v.

COOK COUNTY SHERIFF  
THOMAS DART, in his official capacity,  
ANTWAUN BACON, a CCDOC officer, and  
COOK COUNTY, a municipal corporation,

Defendants.

Case No. 22 cv 003718

Judge Robert W Gettleman

**DEFENDANTS' MOTION TO EXTEND EXPERT  
DISCOVERY DEADLINES**

NOW COMES Defendants, COOK COUNTY, COOK COUNTY SHERIFF (hereinafter "Defendants"), by their attorneys KIMBERLY M. FOXX, State's Attorney of Cook County, through her Assistant State's Attorney, James O'Connor, joined by Defendants Antwaun Bacon, by his attorneys Zachary Stillman and Jason DeVore, and moves to extend expert discovery deadlines. In support thereof Defendants state as follows:

1. After an unopposed motion by Plaintiff, the Court set expert discovery deadlines of September 3, 2024 for Plaintiff to disclose their expert and October 3, 2024 to depose Plaintiff's expert, as well as Defendant's expert to be disclosed by November 4, 2024 and deposed by December 4, 2024. [Dkt. 59].
2. On September 19, 2024, the Parties filed a joint status report indicating that the Plaintiff did not intend to retain an expert witness. [Dkt. 61].
3. On September 19, 2024, the Court, on its own motion, amended the expert discovery schedule and set a date of October 7, 2024, for Defendants to disclose

their expert witnesses and a deadline of November 7, 2024, to complete the depositions. [Dkt. 62].

4. With the current deadline set by the Court, the Defendants are still in the process of identifying an expert witness, and intend to retain one.
5. Defendants are requesting that the court allow until November 4, 2024, (the original deadline) for Defendants to disclose their expert to Plaintiff and until December 4, 2024, to complete the deposition.
6. Prior to filing this motion, Defendants did contact Plaintiff's counsel and Plaintiff indicated they object to Defendants' motion.

WHEREFORE, Defendants, COOK COUNTY, COOK COUNTY SHERIFF and Antwaun Bacon, respectfully request that this Honorable Court grant an extension of time of 28 days, up to and including November 4, 2024, to disclose their expert and up to and including December 4, 2024 to complete the deposition and to grant any other relief it deems necessary and just.

Respectfully submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

/s/ James O'Connor  
James O'Connor  
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**CERTIFICATE OF SERVICE**

The undersigned, James O'Connor, an attorney, hereby certifies that on October 7, 2024 the foregoing document was electronically filed using the CM/ECF system, which sent a notice of Electronic Filing to all parties of record. I certify that in accordance with Fed. R. Civ. P. and LR 5.5 and the General Order on Electronic Case Filing (ECF), the foregoing was served upon All ECF users. There are no Non-EFC users to be served.

/S/ James O'Connor  
James O'Connor